

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817  
Case No. 1:18-CV-00864

*This Document Relates To:*

Hon. Robert M. Dow, Jr.

i3 Brands, Inc. et al. v. CDK Global, LLC, et al.,  
No. 1:19-CV-01412

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs i3 Brands, Inc. and PartProtection, LLC, by their undersigned attorneys, hereby request leave to file their Opposition to The Reynolds and Reynolds Company's Motion to Dismiss In Favor of Arbitration, or in the Alternative, To Dismiss Under Rule 12(b)(6) (the "Opposition Brief"), under seal. Plaintiffs' Opposition Brief contains confidential business information and contract language. Plaintiffs therefore request leave to file the Opposition Brief under seal in accordance with the Second Amended Agreed Confidentiality Order. Plaintiffs will also file a public, redacted version of the Opposition Brief.

Dated: May 3, 2019

Respectfully submitted,

/s/ Michael E. Bloom

J. Erik Connolly

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PartProtection, LLC*

**CERTIFICATE OF SERVICE**

Michael E. Bloom, an attorney, hereby certifies that on May 3, 2019, he caused a true and correct copy of the foregoing **MOTION FOR LEAVE TO FILE UNDER SEAL** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system.

/s/ Michael E. Bloom